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Cape Henlopen Shellfish, Inc.
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March 23, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, Maryland 20852

[Docket No. 98P-0504]

To Whom It May Concern:

I wish to hereby state my objection to the petition by the Center For Science In the Public Interest to "require that shellfish sold for raw consumption be free of the bacteria, called *Vibrio vulnificus*."

While there is a human health risk associated with the consumption of raw molluscan shellfish harvested from any waters, the risk is negligible. Statistics do not bear out the "one-in-nine" risk referenced in the petition. The actual risk is less than that associated with driving an automobile, walking inner-city streets, boating, etc. The Interstate Shellfish Conference (ISSC) has fostered constructive notice to the public regarding that risk. This is a result of cooperation between the Federal Government, the states, and the shellfish industry. It is presumptions to even assume that life can be made risk free. Attempting to do so only infringes on freedoms, and in this case would unnecessarily put many successful business people in the shellfish industry out of business - most of whom have never had even a minor shellfish-related illness associated with the consumption of their product.

Thank you for your attention to this matter.

Regards,  oysterman-shellstockshipper
Ray Trout

cc: The Honorable William V. Roth
Ken Moore
Jack Pingree

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